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Attorneys for Plaintiff,  
SIX4THREE, LLC, a Delaware  
limited liability company

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SIX4THREE, LLC, a Delaware limited  
liability company,

Plaintiff,

v.

FACEBOOK, INC., a Delaware corporation,  
and DOES 1 through 50, inclusive

Defendants.

Case No. 3:17-cv-00359-WHA

PLAINTIFF'S RESPONSE TO  
REQUEST FOR FURTHER RESPONSE

Date: February 16, 2017

Time: 8:00AM

Ctrm: 8

Judge: Honorable William H. Alsup

1 Plaintiff Six4Three, LLC hereby responds to Judge Alsup's Request for Further Response  
2 from Plaintiff (#31) as follows: Plaintiff is not withdrawing its request for fees and costs because  
3 there was no objectively reasonable basis for Defendant's removal petition. Additionally,  
4 Defendant could have withdrawn their opposition to Plaintiff's filing yesterday, but did not,  
5 which required Plaintiff's counsel to travel from Massachusetts for the hearing. Accordingly,  
6 Plaintiff respectfully requests that the Court enter an order granting Plaintiff's motion to remand  
7 and awarding Plaintiff its costs and attorneys' fees incurred with respect to its motion to remand.  
8 Plaintiff requests 14 days to submit supporting materials  
9  
10  
11

12 Dated: February 15, 2017

CRITERION LAW

BIRNBAUM & GODKIN, LLP

15 By: /s/ David S. Godkin

Basil P. Fthenakis

David S. Godkin (admitted *pro hac vice*)

James E. Kruzer (admitted *pro hac vice*)

Attorneys for Plaintiff

Six4Three, LLC

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies, under penalty of perjury under the laws of the State of California, that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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DATED: February 15, 2017

By: /s/ David S. Godkin  
David S. Godkin